

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO. 2:23-CR-0003
	:	JUDGE WATSON
v.	:	
	:	
	:	
PETROCELLI ROBERTSON,	:	
(a/k/a “Bible” a/k/a “Juice)	:	
	:	
Defendant.	:	

JOINT MOTION TO CONTINUE THE TRIAL DATE

Now come the parties, through their undersigned attorneys, and jointly submit this Joint Motion to Continue the Trial Date and associated deadlines listed in the scheduling Order, for a period of 60 to 90 days. A memorandum in support is attached.

Respectfully submitted,

KENNETH L. PARKER

United States Attorney

s/ Samuel H. Shamansky
SAMUEL H. SHAMANSKY
Counsel for Mr. Robertson
523 South Third Street
Columbus, OH 43215
(614)242-3939
(614) 242-3999
sshamansky@gmail.com
Counsel for the Defendant

s/ Elizabeth A. Geraghty
ELIZABETH A. GERAGHTY (0072275)
JENNIFER M. RAUSCH (0075138)
Assistant United States Attorneys
303 Marconi Boulevard, Ste. 200
Columbus, Ohio 43215
(614) 469-5715
elizabeth.geraghty@usdoj.gov
Jennifer.rausch@usdoj.gov

MEMORANDUM IN SUPPORT

On January 10, 2023, the Grand Jury returned a three-count Indictment against Mr. Robertson charging him in Counts One and Two with Felon in Possession of a Firearm in violation of 18 U.S.C. § 922(g)(1); and Count Three with Possession with Intent to Distribute Fentanyl, Cocaine Base and Methamphetamine in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C). Trial is currently set for March 20, 2023. This is a first trial date set. There have been no previous motions to continue.

Defense has received initial discovery and the government anticipates additional discovery to be provided in the near future. Defense is currently reviewing discovery with Mr. Robertson and determining if any potential pretrial motions are necessary. The parties need additional time to provide supplemental discovery and negotiate a possible resolution.

Counsel for all parties agree that this request is not made for the purpose of needless delay and that the interests of justice served by a continuance outweigh the interests of the public and of Petrocelli Robertson in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

For these reasons, the parties request a continuance of the trial schedule and associated deadlines for 60-90 days consistent with this motion.

Respectfully submitted,

KENNETH L. PARKER

United States Attorney

s/ Samuel H. Shamansky

SAMUEL H. SHAMANSKY

Counsel for Mr. Robertson

523 South Third Street

Columbus, OH 43215

(614)242-3939

(614) 242-3999

sshamansky@gmail.com

Counsel for the Defendant

s/ Elizabeth A. Geraghty

ELIZABETH A. GERAGHTY (0072275)

JENNIFER M. RAUSCH (0075138)

Assistant United States Attorneys

303 Marconi Boulevard, Ste. 200

Columbus, Ohio 43215

(614) 469-5715

elizabeth.geraghty@usdoj.gov

Jennifer.rausch@usdoj.gov